

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

INTERFOCUS INC., A California  
Corporation,

Plaintiff,

v.

The Defendants Identified in SCHEDULE  
A,

Defendant.

Case No.: 1:22-cv-2259

**PLAINTIFF’S EX PARTE MOTION FOR ENTRY OF A TEMPORARY  
RESTRAINING ORDER, INCLUDING A TEMPORARY ASSET RESTRAINT, AND  
EXPEDITED DISCOVERY**

Plaintiff INTERFOCUS INC. (“Plaintiff”) moves, *ex parte*, for entry of a temporary restraining order (“TRO”), including a temporary asset restraint, and expedited discovery.

The grounds for this motion are (1) Defendants, who are identified in Schedule A to the Complaint (filed under seal) are China or Hong Kong-based entities who misappropriated source code for Plaintiff’s website to set up their own website, and are using their website to offer for sale and sell counterfeit products into this District, including counterfeits of Plaintiff’s products. Grounds for this motion are further provided in the declarations of Amanda Richardson-Golden, Mark Lee, Robert Rosenblum, and Sandi Graham, and in the Memorandum of Law filed in support of this motion.

Date: May 3, 2022

Respectfully submitted,

RIMON, P.C.

/s/ Eric C. Cohen

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